

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DOCKET NO. 04-10299-23-PBS

UNITED STATES OF AMERICA

v.

DANIEL AGUILAR

DEFENDANT'S REQUESTED QUESTIONS FOR THE JURY VENIRE

The defendant, Daniel Aguilar, by his attorney, requests that, in addition to those questions commonly put to the venire in cases commenced in this Court, the Court pose the following questions to the prospective jurors in this case:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:
 - a) ever been employed by the government; specifically by the United States Attorney's Office, the United States Probation Office, the United States Pre-Trial Services Office, the United States District Court Clerk's Office, the United States Marshals Service, or the Drug Enforcement Administration, known as the "DEA"?
 - b) ever been employed by any police department or law enforcement agency?
 - c) ever had any involvement of any sort with the Salem, Saugus, Peabody, Medford, Lynn, Danvers, MA police department or New York City police Department?
2. Are you aware of any prejudice that you may have against Spanish

speaking individuals or individuals born in countries where Spanish is the primary language, such that would in any way impair your ability to evaluate and judge fairly and impartially the facts of this case and therefore the innocence or guilt of this defendant?

Do you believe that the impact of narcotics crimes in the United States is disproportionately caused by Spanish speaking individuals?

3. Some of the witnesses expected to be called by the United States at trial are Special Agents of the Drug Enforcement Administration. These law enforcement officers will be called to testify as to their knowledge of alleged crimes perpetrated by the defendants herein.

Are you aware of any prejudice that you might have for or against a witness or other individual in this case where that witness or individual is a law enforcement officer or otherwise an employee of the government?

Do you believe that law enforcement officers are more believable than witnesses who are not law enforcement officers?

4. Have you, or anyone in your family or close circle of friends ever been treated for an addition to any narcotic substance?

5. Have you, or anyone in your family or close circle of friends ever been the victim or the defendant in a narcotics related crime?

Respectfully submitted,

Dated: February 24, 2006

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Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on this 24th day of February, 2006.

/s/ Benjamin D. Entine, Esq.